

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>  <b>FIELDWOOD ENERGY LLC, <i>et al.</i>,</b>  <b>Debtors.<sup>1</sup></b>	§ § § § § § §	<b>Chapter 11</b>  <b>Case No. 20-33948 (MI)</b>  <b>(Jointly Administered)</b>
---	---------------------------------	---

**DECLARATION OF ERIN M. CHOI IN SUPPORT OF  
SUPPLEMENT TO EMERGENCY MOTION TO COMPEL BP EXPLORATION &  
PRODUCTION INC. TO PERFORM PRE-PETITION CONTRACTS AND  
UPDATE IN ADVANCE OF FEBRUARY 1, 2021 STATUS CONFERENCE**

I, Erin M. Choi, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a senior associate of the firm Weil, Gotshal & Manges LLP (“**Weil**”), which maintains an office for the practice of law at 700 Louisiana Street, Suite 1700, Houston, Texas 77002. I am an attorney at law, duly admitted and in good standing to practice in the State of Texas and I am admitted to practice before the U.S. District Courts for the Northern, Southern, and Eastern Districts of Texas. I have made an appearance in the above-captioned chapter 11 cases to represent Fieldwood Energy LLC (“**Fieldwood**”) and its debtor affiliates, as debtors and debtors in possession (collectively, the “**Debtors**”).

2. I submit this Declaration in support of the *Supplement to Emergency Motion to Compel BP Exploration & Production Inc. (“BP”) to Perform Pre-Petition Contracts and*

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy LLC (6778), Fieldwood Energy Inc. (4991), Fieldwood Onshore LLC (3489), Fieldwood SD Offshore LLC (8786), Fieldwood Energy Offshore LLC (4494), Fieldwood Offshore LLC (2930), GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440), Galveston Bay Procession LLC (5703), Galveston Bay Procession LLC (0422), Fieldwood Energy SP LLC (1971), Dynamic Offshore Resources NS, LLC (0158), Bandon Oil and Gas, LP (9266), and Bandon Oil and Gas GP, LLC (9172). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

*Update in Advance of February 1, 2021 Status Conference* (“**Supplement**”), filed concurrently herewith in the above-captioned proceeding.

3. Attached as Exhibit H is a true and correct copy of a letter, dated January 31, 2021, emailed from Greenberg Traurig, LLP to Weil, Gotshal & Manges, LLP at 10:24 a.m. CT.

4. Attached as Exhibit I is a true and correct copy of BP’s SOP schedule, attached to an email dated January 28, 2021, sent from BP to Fieldwood at 4:34 p.m. CT.

5. Attached as Exhibit J is a true and correct copy of an email dated January 28, 2021, sent from Fieldwood to BP at 7:59 p.m. CT.

6. Attached as Exhibit K is a true and correct copy of an email dated January 29, 2021, sent from Fieldwood to BP, Red Willow Offshore, LLC (“**Red Willow**”), and Houston Energy Inc. (“**Houston Energy**”) at 4:35 p.m. CT.

7. Attached as Exhibit L is a true and correct copy an email dated January 29, 2021, sent from Red Willow to BP, Fieldwood, and Houston Energy at 4:50 p.m. CT.

8. Attached as Exhibit M is a true and correct copy of an email dated January 29, 2021, sent from Houston Energy to BP, Fieldwood, and Red Willow at 5:05 p.m. CT.

9. Attached as Exhibit N is a true and correct copy of an email dated January 29, 2021, sent from Fieldwood to BP, Red Willow, and Houston Energy at 5:36 p.m. CT.

10. Attached as Exhibit O is a true and correct copy of an email, dated January 31, 2021, sent from Greenberg Traurig, LLP to Weil, Gotshal & Manges, LLP at 7:27 p.m. CT.

11. I hereby declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated: February 1, 2021  
Houston, Texas

/s/ Erin M. Choi

Erin M. Choi